

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

MICHAEL GONIDAKIS, MARY PARKER,
MARGARET CONDITT, BETH
VANDERKOOI, LINDA SMITH,
DELBERT DUDUIT, THOMAS W. KIDD
JR., DUCIA HAMM,

Plaintiffs,

BRIA BENNETT, REGINA C. ADAMS,
KATHLEEN M. BRINKMAN, MARTHA
CLARK, SUSANNE L. DYKE, MERYL
NEIMAN, HOLLY OYSTER, CONSTANCE
RUBIN, EVERETT TOTTY,

Intervenor-Plaintiffs,

v.

FRANK LAROSE, in his capacity as Ohio
Secretary of State,

Defendant.

Case No. 2:22-cv-00773

Chief Judge Algenon L. Marbley
Judge Amul R. Thapar
Judge Benjamin J. Beaton

NOTICE REGARDING MAP FILES

Intervenor-Plaintiffs Bria Bennett, Regina C. Adams, Kathleen M. Brinkman, Martha Clark, Susanne L. Dyke, Meryl Neiman, Holly Oyster, Constance Rubin, and Everett Totty (the “Bennett Petitioners”) respectfully submit this Notice to inform the Court that, if the Court (a) determines that it will order the use of a General Assembly plan for the 2022 election and (b) selects the Corrected Independent Map Drawers’ Plan or the Rodden III Plan, the Bennett Petitioners stand ready to supply Secretary LaRose with all of the plan files that the Secretary contends are “needed by the county boards of election to reprogram their voter registration systems and elections management systems.” ECF No. 164 at PageID # 5396 n.3. The Bennett Petitioners have already made Census block assignment files available for the Corrected Independent Map

Drawers' Plan, ECF No. 177-1 at PageID # 5773 ¶ 6, and for the Rodden III Plan, ECF No. 107 at PageID # 2555 n.10; can provide the shape files and most populous county designations for both plans, as indicated in their April 11 brief, ECF No. 181 at PageID # 5903; and have prepared draft legal descriptions that the Secretary's office may finalize as appropriate.

Dated: April 18, 2022

Abha Khanna**
Ben Stafford **
ELIAS LAW GROUP LLP
1700 Seventh Ave, Suite 2100
Seattle, WA 98101
T: (206) 656-0176
F: (206) 656-0180
akhanna@elias.law
bstafford@elias.law

David R. Fox**
Jyoti Jasrasaria**
Spencer W. Klein**
Harleen Gambhir**
Raisa Cramer**
ELIAS LAW GROUP LLP
10 G St NE, Suite 600
Washington, DC 20002
T: (202) 968-4490
F: (202) 968-4498
dfox@elias.law
jjasrasaria@elias.law
sklein@elias.law
hgambhir@elias.law
rcramer@elias.law

Respectfully submitted,

/s/ Donald J. McTigue
Donald J. McTigue* (OH 0022849)
**Counsel of Record*
Derek S. Clinger (OH 0092075)
MCTIGUE COLOMBO & CLINGER LLC
545 East Town Street
Columbus, OH 43215
T: (614) 263-7000
F: (614) 368-6961
dmctigue@electionlawgroup.com
dclinger@electionlawgroup.com

** Admitted pro hac vice
Counsel for Bennett Petitioners

CERTIFICATE OF SERVICE

This is to certify a copy of the foregoing was served upon all counsel of record by means of the Court's electronic filing system on this 18th Day of April, 2022.

/s/ Donald J. McTigue
Donald J. McTigue (OH 0022849)